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*Co-Counsel to the Ad Hoc Committee of
Governmental and Other Contingent
Litigation Claimants*

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----	X
In re	: Chapter 11
	:
PURDUE PHARMA L.P., <i>et al.</i> ,	: Case No. 19-23649 (RDD)
	:
Debtors ¹ .	: (Jointly Administered)
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**EIGHTH MONTHLY FEE STATEMENT OF OTTERBOURG P.C.
FOR ALLOWANCE OF COMPENSATION FOR SERVICES
RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED
AS CO-COUNSEL OF THE AD HOC COMMITTEE'S PROFESSIONALS FOR THE
PERIOD OF MAY 1, 2020 THROUGH AND INCLUDING MAY 31, 2020**

Name of Applicant:	Otterbourg P.C.
Applicant's Role in Case:	Co-Counsel to the Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants
Date of Order Approving Debtors' Payment of Fees and Expenses of Applicant:	December 2, 2019, [dkt. no. 553]

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF L.P. (0495), SVC Pharma L.P. (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

Period for Which Compensation is Sought:	May 1, 2020 – May 31, 2020
Total Amount of Fees Incurred:	\$78,149.50
Total Fees Requested (80%):	\$62,519.60
Total Reimbursement of Expenses Incurred:	\$166.99
Total Reimbursement of Expenses Requested (100%):	\$166.99
Total compensation and Reimbursement Requested in this Statement:	\$62,686.59
This is Applicant's:	Eighth Monthly Fee Statement

Pursuant to the *Order Authorizing the Debtors to Assume the Reimbursement Agreement and Pay the Fees and Expenses of the Ad Hoc Committee's Professionals*, dated December 2, 2019 [Dkt. No. 553] (the "Fee Assumption Order"), and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals*, dated November 21, 2019 [Dkt. No. 529] (the "Interim Compensation Order"), Otterbourg P.C. (the "Applicant"), Co-Counsel to the Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants in the above-captioned case, hereby submits this Eighth Monthly Fee Statement (the "Fee Statement") for the period of May 1, 2020 through and including May 31, 2020 (the "Statement Period").

Itemization of Services Rendered and Disbursements Incurred

1. Annexed hereto as **Exhibit A** is a chart of the aggregate number of hours expended and fees incurred by professionals and paraprofessionals during the Statement Period with respect to each of the project categories. As reflected in Exhibit A, Applicant incurred \$78,149.50 in fees during the Statement Period. Pursuant to this Fee Statement, Applicant seeks reimbursement for 80% of such fees, totaling \$62,519.60.

2. Annexed hereto as **Exhibit B** is a chart of Applicant's professionals and paraprofessionals, including the standard hourly rate for each attorney and paraprofessional who rendered services to the Debtors in connection with these chapter 11 cases during the Statement Period and the title, hourly rate, aggregate hours worked and the amount of fees earned by each professional. The blended hourly billing rate of attorneys for all services provided during the Statement Period is \$1,123.45². The Blended hourly rate of all paraprofessionals is \$305.00³. A copy of the computer-generated time entries reflecting the time recorded, organized in project billing categories by Applicant is attached hereto as **Exhibit C**.

3. Annexed hereto as **Exhibit D** is a chart of necessary and out-of-pocket expenses incurred by the Applicant in the amount of \$166.99 in connection with providing professional services during the Statement Period. A copy of the computer-generated list of expenses is attached hereto as **Exhibit E**.

4. Applicant, to the best of its knowledge, has not included any fees in connection with or relating to the allocation of value among the Debtors' creditors (the "Allocation Fees"). Pursuant to the Fee Assumption Order, Applicant may request Allocation Fees through a separate application at a later date.

Notice

5. Applicant will provide notice of this Fee Statement in accordance with the Interim Compensation Order.

WHEREFORE, Applicant, in connection with services rendered as co-counsel to the ad hoc committee of governmental and other contingent litigation claimants, respectfully requests

² The blended hourly billing rate of \$1,171.44 is derived by dividing the total fees for attorneys of \$77,783.50 by the total hours of 66.4.

³ The Blended hourly billing rate of \$305.00 for paraprofessionals is similarly derived by dividing the total fees for paraprofessionals of \$366.00 by the total hours of 1.2.

(i) compensation in the amount of \$62,519.60 which is equal to 80% of the total amount of reasonable compensation for actual, necessary legal services that Applicant incurred in connection with such services during the Statement Period (*i.e.*, \$78,149.50) and (ii) payment of \$166.99 for the actual, necessary expenses that Applicant incurred in connection with such services during the Statement Period.

Dated: July 13, 2020
New York, New York

OTTERBOURG P.C.

By: /s/ Melanie L. Cyganowski
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*Co-Counsel to the Ad Hoc Committee of
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Litigation Claimants*

EXHIBIT A

Fees By Project Category

**SUMMARY OF COMPENSATION BY PROJECT CODE
FOR THE STATEMENT PERIOD**

Project Code	Project Category	Total Hours	Total Fees
PU01	Asset Analysis and Recovery	8.5	\$9,178.00
PU03	Business Operations	5.5	\$6,535.00
PU04	Case Administration	12.5	\$15,995.00
PU05	Claims Analysis	12.1	\$14,144.50
PU06	Employment and Fee Applications	1.9	\$1,310.50
PU09	Meetings and Communications w/ AHC	18.4	\$19,546.00
PU11	Plan and Disclosure Statement	8.7	\$11,440.50
	TOTALS:	67.6	\$78,149.50

EXHIBIT B

Professional and Paraprofessional Fees

**SUMMARY OF HOURS BILLED BY PROFESSIONALS AND PARAPROFESSIONALS
FOR THE STATEMENT PERIOD**

Professional	Year Admitted	Rate Per Hour	No. of Hrs.	Total Compensation
Melanie L. Cyganowski ("MLC") Partner	1982	\$1315.00	45.9	\$60,358.50
Jennifer S. Feeney ("JSF") Of Counsel	1998	\$850.00	20.5	\$17,425.00
Jessica K. Hildebrandt ("JKH") Paralegal	N/A	\$305.00	1.2	\$366.00
	TOTAL		67.6	\$78,149.50

EXHIBIT C

Time Detail

OTTERBOURG P.C.
230 PARK AVENUE
NEW YORK, NY 10169-0075

Client/Matter No.: 20186/0002
Matter Name: CHAPTER 11
Billing Partner: RL STEHL

June 26, 2020
BILL NO. 210791

For Services Rendered Through May 31, 2020:

Phase: PU01		ASSET ANALYSIS AND RECOVERY	
<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/01/20 JSF	Telephone Call(s) Court Hearing via Conference Call on 2004 Discovery Issues (partial attendance)	2.30	1,955.00
05/01/20 MLC	Court Appearance - General Appeared at court conference concerning discovery disputes with Sacklers (partial attendance by MLC)	.90	1,183.50
05/04/20 MLC	Analysis of Memorandum Review and analysis of memo prepared by KL re discovery issues presented in connection with Sacklers	1.40	1,841.00
05/05/20 JSF	Examine Documents Letter to IAC's re: Discovery open issues	.20	170.00
05/08/20 JSF	Examine Documents Update on Due Diligence and Document Production by Sacklers	.20	170.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/11/20 MLC	Analysis of Memorandum Review of 2004 Discovery Orders entered by Court	1.10	1,446.50
05/14/20 JSF	Examine Documents Update on Discovery and Letter to Court from Sackler Family Attorney re: NY AG	.20	170.00
05/15/20 JSF	Telephone Call(s) Due Diligence Call with AHC Subcommittee and Non-Consenting State Group	1.20	1,020.00
05/20/20 JSF	Examine Documents HL Overview Analysis of Potential Asset Value	.20	170.00
05/28/20 MLC	Correspondence Correspondence with UCC concerning discovery stipulation and limitations upon AHC due diligence	.80	1,052.00
TOTAL PHASE PU01		8.50	\$9,178.00

Phase: PU03

BUSINESS OPERATIONS

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/06/20 MLC	Analysis of Memorandum Review and analysis of memorandum re revised HRT motion to be presented by debtors	.90	1,183.50
05/11/20 JSF	Examine Documents Update on HRT	.10	85.00
05/12/20 JSF	Telephone Call(s) Call with Monitor to Preview Upcoming Report	1.00	850.00
05/12/20 JSF	Examine Documents Update on HRT Motion and Revisions to Relief Requested	.20	170.00
05/12/20 MLC	Analysis of Memorandum Review of analysis of HRT motion prepared by FTI and KL	1.10	1,446.50
05/12/20 MLC	Correspondence Correspondence with counsel re report prepared by Dr Benkus	.60	789.00
05/27/20 JSF	Examine Documents Update on HRT Agreement	.20	170.00
05/28/20 MLC	Analysis of Memorandum Review of tax analysis prepared by BR	.70	920.50

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/31/20 MLC	Correspondence Correspondence with UCC and NCSG re HRT motion	.40	526.00
05/31/20 MLC	Correspondence Correspondence re scheduling of interview of Dr Brenkus	.30	394.50
TOTAL PHASE PU03		5.50	\$6,535.00

Phase: PU04	CASE ADMINISTRATION
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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/02/20 MLC	Correspondence Correspondence with Aaron Cahn and K Eckstein concerning W Virginia questions re plan structure questions	.40	526.00
05/07/20 MLC	Analysis of Memorandum Review of KL memo analyzing Eighth Circuit in context of plan structure decision	.70	920.50
05/08/20 MLC	Analysis of Memorandum Review of memo re proof of claim process and requirements for non-states and localities	1.50	1,972.50

OTTERBOURG P.C.
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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/08/20 MLC	Conference call(s) Conference call with AHC states and counsel re proof of claim process	.50	657.50
05/10/20 MLC	Correspondence Correspondence re general scheduling of mediation and outlining of open issues	1.30	1,709.50
05/11/20 MLC	Analysis of Memorandum Review of certain newly released Interlinks memos	2.10	2,761.50
05/12/20 MLC	Conference call(s) Conference call with AHC counsel re HRT motion	.30	394.50
05/13/20 MLC	Telephone Call(s) Telcon with Rachael Ringer re general scheduling and next steps	.40	526.00
05/13/20 MLC	Correspondence Correspondence with AHC counsel re coordination of tasks	.40	526.00
05/14/20 MLC	Telephone Call(s) Telcon with Ken Eckstein re HRT adjournment	.20	263.00
05/18/20 JKH	Diary & Docket Review of email containing hearing dates and calendaring same	.20	61.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/21/20 MLC	Analysis of Memorandum Analysis of report filed by Monitor	.60	789.00
05/21/20 JKH	Diary & Docket Review of email re: bar date motion and calendar hearing	.10	30.50
05/22/20 MLC	Analysis of Memorandum Review of report filed by Monitor	.60	789.00
05/26/20 JSF	Examine Documents Review of Purdue Monitor's Report Summary	.30	255.00
05/26/20 MLC	Analysis of Memorandum Review of KL memo and the underlying application re Cornerstone retention application	1.10	1,446.50
05/27/20 MLC	Analysis of Memorandum Review of KL memo re revisions to Cornerstone retention application and pending motions	1.20	1,578.00
05/31/20 MLC	Correspondence Correspondence re call with state members of AHC re status of various matters including response to bar date motion	.60	789.00
TOTAL PHASE PU04		12.50	\$15,995.00

Phase: PU05

CLAIMS ANALYSIS

OTTERBOURG P.C.
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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/05/20 JSF	Examine Documents Correspondence and Forms re: Filing Aggregate Claim Per Bar Date Order	1.10	935.00
05/06/20 JSF	Examine Documents Correspondence re: Bar Date Order and Proofs of Claim and Process and Ability to File Aggregate POC and Analysis of Issues Relating Thereto	1.20	1,020.00
05/08/20 JSF	Examine Documents Schedules of Assets and Liabilities re: Scheduling of State and County Claims	.60	510.00
05/08/20 JSF	Examine Documents Proof of Claim Materials Distributed to Creditors	.30	255.00
05/12/20 MLC	Analysis of Memorandum Review of correspondence and memo re various requests by creditors for extension of the bar date	.80	1,052.00
05/13/20 MLC	Correspondence Correspondence with AHC and MSG members re bar date extension letter requests	.40	526.00
05/14/20 MLC	Conference call(s) Conference call with Jenni Peacock and Paul Singer re bar date extension issues	.40	526.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/18/20 MLC	Analysis of Memorandum Review of letter filed by Harrison Cullens in connection with bar date issues	.40	526.00
05/19/20 JSF	Examine Documents Pleadings in Support of Extension of Bar Date	.20	170.00
05/21/20 MLC	Analysis of Memorandum Review and analysis of motion filed by debtors to extend the bar date	1.10	1,446.50
05/22/20 MLC	Analysis of Memorandum Review of debtors' motion to extend bar date	.70	920.50
05/29/20 JSF	Examine Documents Draft Response to Bar Date Motion to Extend Deadline	.40	340.00
05/29/20 MLC	Correspondence Correspondence re bar date extension motion and AHC response thereto	.70	920.50
05/29/20 MLC	Analysis of Memorandum Reviewed draft of AHC response to bar date extension motion	1.00	1,315.00
05/30/20 MLC	Analysis of Memorandum Review of revised draft of AHC response to bar date motion	.80	1,052.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/31/20 MLC	Analysis of Memorandum Review of further changes to response to bar date extension motion	.90	1,183.50
05/31/20 MLC	Analysis of Memorandum Review of NCSG response to debtors' bar date extension motion	1.10	1,446.50
TOTAL PHASE PU05		12.10	\$14,144.50

Phase: PU06

EMPLOYMENT & FEE APPLICATIONS

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/18/20 MLC	Draft/revise Reviewed and revised monthly fee statement for March	.40	526.00
05/19/20 JSF	Examine Documents Sixth Monthly Fee Statement for Filing	.20	170.00
05/19/20 JKH	Prepare Legal Papers Preparing monthly statement for filing and calendaring objection deadline	.10	30.50
05/20/20 JKH	Prepare Legal Papers Prepare draft monthly statement	.20	61.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/26/20 JSF	Examine Documents April Monthly Fee Statement	.40	340.00
05/26/20 JKH	Prepare Legal Papers Prepare Seventh Monthly fee Statement	.60	183.00
TOTAL PHASE PU06		1.90	\$1,310.50

Phase: PU09	MEETINGS & COMMUNICATIONS W/ AD HOC
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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/01/20 JSF	Examine Documents Review of updates to AHC Members re: Pending Matters for Review by AHC	.20	170.00
05/02/20 MLC	Correspondence Correspondence with AHC committee members re next steps in mediation process	.50	657.50
05/06/20 JSF	Telephone Call(s) Weekly Call with AHC re: Issues for consideration by AHC	2.20	1,870.00
05/06/20 MLC	Conference call(s) Meeting of AHC re HRT and other matters	2.20	2,893.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/07/20 MLC	Correspondence Correspondence with counsel concerning scheduling of various calls with AHC members in anticipation of court hearing next week	.40	526.00
05/07/20 MLC	Correspondence Correspondence with AHC state members re various scheduling of calls	.30	394.50
05/08/20 JSF	Telephone Call(s) Pre-Call with Texas and Tennessee re: Bankruptcy Plan Issues and Requirements for Confirmation	.50	425.00
05/08/20 JSF	Telephone Call(s) Call with States on AHC re: Plan Issues and Confirmation Requirements	1.30	1,105.00
05/12/20 JSF	Telephone Call(s) Weekly AHC Conference Call	1.60	1,360.00
05/12/20 JSF	Examine Documents Agenda for Weekly AHC Meeting	.20	170.00
05/12/20 MLC	Prepare for Meeting Prepared for meeting with AHC members	.70	920.50

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/15/20 JSF	Examine Documents Review updates to Committee on Pending Motions, Discovery and mediation Discussions	.30	255.00
05/15/20 MLC	Conference call(s) Conference call with AHC States only re plan strategy	1.20	1,578.00
05/15/20 MLC	Conference call(s) Conference call with AHC representatives re recently filed motions	.80	1,052.00
05/18/20 JSF	Telephone Call(s) AHC Update Conference Call Re: Pending Matters	1.20	1,020.00
05/19/20 MLC	Conference call(s) Conference call with states re update of pending motions	.80	1,052.00
05/20/20 JSF	Telephone Call(s) AHC Weekly Conference Call	1.50	1,275.00
05/20/20 MLC	Conference call(s) Meeting of AHC re pending matters	1.50	1,972.50
05/21/20 JSF	Examine Documents Updates to AHC re: Bar Date Extension and Monitor Report	.30	255.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/27/20 JSF	Telephone Call(s) Weekly AHC Conference Call	.70	595.00
TOTAL PHASE PU09		18.40	\$19,546.00

Phase: PU11	PLAN & DISCLOSURE STATEMENT
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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/08/20 MLC	Conference call(s) Conference call with counsel re plan structure and related issues	1.30	1,709.50
05/18/20 MLC	Conference call(s) Conference call with Singer, Peacock, Thurmond and Ringer/Eckstein re overall structure of proposed plan	.80	1,052.00
05/18/20 MLC	Correspondence Correspondence among AHC counsel re plan discussions with UCC and Debtors' counsel	.70	920.50
05/18/20 MLC	Analysis of Memorandum Review of analysis of RSA draft prepared by KL for discussion purposes	1.30	1,709.50

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230 PARK AVENUE
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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/19/20 MLC	Telephone Call(s) Telcon with Eric Snyder (Alabama outside counsel) re status of plan discussions and next steps	.60	789.00
05/22/20 MLC	Conference call(s) Conference call with small AHC group re plan strategy	.60	789.00
05/22/20 MLC	Telephone Call(s) Telcon with Ken Eckstein re alternative approaches to plan proposal	.30	394.50
05/26/20 MLC	Conference call(s) Conference call with KL and certain State representatives re nature of proposed plan with abatement as model	1.10	1,446.50
05/28/20 MLC	Analysis of Memorandum Review and analysis of Tribes memorandum re COVID impact	1.60	2,104.00
05/29/20 MLC	Correspondence Correspondence involving conversations with debtors' counsel re plan development	.40	526.00
TOTAL PHASE PU11		8.70	\$11,440.50
			\$78,149.50

EXHIBIT D

Summary of Actual and Necessary Expenses

**SUMMARY OF ACTUAL AND NECESSARY DISBURSEMENTS FOR THE
STATEMENT PERIOD**

Expense Category	Total Expenses
Electronic Research	\$166.99
TOTAL:	\$166.99

EXHIBIT E

Expense Detail

OTTERBOURG P.C.
230 PARK AVENUE
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DISBURSEMENTS FOR YOUR ACCOUNT

Electronic Research	166.99
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TOTAL DISBURSEMENTS	<hr/> 166.99
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